



CELLULAR TELECOMMUNICATIONS & INTERNET ASSOCIATION

Number Resource Optimization & Local Number Portability

December 4, 2001



NUMBER RESOURCE OPTIMIZATION



- Technology-Specific Overlays should be allowed only on a transitional basis and no “Take Backs” should be allowed.
- The FCC must continue to apply uniform, national numbering resource optimization rules.





CTIA supports Technology-Specific Overlays (“TSO”) provided that:

- **Any TSO is transitional;**

To minimize the discriminatory effect of disparate dialing plans, a TSO should end as soon as CMRS carriers can support Thousands-Block Pooling (i.e., only until November 24, 2002)

- **TSOs would be used only in area codes where pooling has been implemented and numbers are near exhaust; and**
- **There is no “take back” of legacy wireless codes.**



“Take Backs” impose an undue burden on wireless customers by requiring them to:

- Surrender existing numbers;
- Bring handsets to service centers for manual programming;
- Change over to new numbers; and
- Inform callers of the new numbers.



The FCC has rejected state requests for permanent TSOs and “Take Backs” because they are:

- **Discriminatory:** The FCC rejected permanent TSOs due to their discriminatory impact on wireless carriers.
- **Anti-competitive:** Permanent TSOs widen rather than narrow the gap between wireless-wireline competition, due to disparate dialing.
- **Inefficient:** Restricting NPAs to specific services is inefficient because only some carriers can draw numbers from the the release of a new TSO.



The FCC must adopt a national “Safety Valve” rule.

- A “Safety Valve” allows a carrier to obtain numbering resources under exceptional circumstances when it does not meet the utilization threshold.
- Wireless carriers require uniform rules because:
 - 1) They are licensed and operate without respect to state lines;
 - 2) They market new services based upon a national basis; and
 - 3) It is consistent with the FCC’s Second R&O, which establishes a uniform, nationwide system for numbering resource optimization.



LOCAL NUMBER PORTABILITY AND THOUSANDS-BLOCK NUMBER POOLING

- Pooling is a number resource optimization tool.
- Porting is a competition-based policy.





While the industry has made significant progress, tremendous challenges lie ahead.

- **Progress Report:** CTIA submitted a voluntary report on Nov. 21, 2001 to the FCC detailing the industry's progress and the challenges ahead.
- **Delays in Inter-Carrier Testing & Vendor Readiness:** Delays may impair industry's ability to meet porting implementation deadlines.
- **National Pooling Schedule:** The wireless industry supports the rollout schedule and intends to be ready in all affected NPAs.



The implementation of pooling alone will pose significant challenges.

- **Impacts to the Public Switched Telephone Network:** Wireline and wireless carriers are concerned about risks to the network.
- **MIN/MDN Separation:** Separating the Mobile Identification Number from the Mobile Directory Number will be a major challenge.
- **MIN Block Identifier Administration:** The schedule is already facing delays.
- **Pooling Administrator:** The administrator's ability to roll-out new pools may be impaired.
- **LEC Resources:** LECs are concerned that pooling volumes may overwhelm staff resources.



The flash-cut deployment of porting and pooling poses serious risks to network reliability.

- The simultaneous mandates will:
 - 1) Jeopardize the ability of carriers to successfully implement pooling; and
 - 2) Divert valuable resources from carriers.
- LECs have expressed concerns about impacts to the network based upon the difficulties wireline carriers have encountered in their roll-out of number pooling and porting.





Unresolved Technical Issues With Porting:

- **Potential Impact on E-911:** There are some concerns that ported subscribers may not always be able to receive response calls from PSAPs.
- **Wireless to Wireline Portability Integration:** The FCC number portability mandate only applies to rate centers; however, wireless calling plans typically extend beyond several rate centers.



The FCC should forbear from mandating wireless porting, or at a minimum, extend the porting deadline for at least two years.

- Verizon Wireless' Petition sets forth competition-based reasons to separate the two mandates.
- CTIA's Reconsideration Petition and recent *Ex Parte* set forth network integrity concerns.
- Extending the deadline will:
 - Reduce risks to the network functions; and
 - Facilitate the wireless industry's ability to meet the pooling deadline.

CONCLUSION



The Commission should:

- Continue to reject permanent TSOs and “Take Backs.”
- Continue to apply a nationwide “Safety Valve” rule.
- Forbear from the porting obligation, or at a minimum, extend the porting deadline for two years.